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*This text is to accompany the commented document as part of the Safety Case Principles consultation.*

In addition to the commented Safety Case Principles document which accompanies this letter, there are a number of comments that we have received from Fire and Rescue Services that do not fit to a specific part of the document. There are also some general comments that NFCC would like to put forward on behalf of the UK FRS that either summarise the points made in the Safety Case Principles document or we believe are best captured outside of it. While these points may not all specifically relate to the Principles document, they do relate to the Safety Case regime.

## **1. Reasonable and proportionate**

The guidance mentions reasonable and proportionate without defining what these are. While we understand that these concepts are yet to be fully defined, mentioning these broad concepts while offering little in terms of what they are likely to mean could cause confusion at this early stage.

The definition of these terms will represent the foundations on which Accountable Persons (AP) will base their safety decisions and the regulators will judge them. Expanding on the concepts to include the thought process around them even if the finer details are not yet available would be preferable to using the terms and assuming that the reader knows what it is supposed to mean.

These terms are key to the understanding of the safety case principle as well as for going beyond the current compliance culture in building safety, therefore it is fundamental to give a broad understanding at this early stage in defining the new regime.

## **2. Competence**

Across the built environment sector, there are ongoing efforts to ensure that the people who work on HRBs are competent to do so. This will include those putting safety cases together and making the safety case reports.

The principles only mention competence briefly but we believe that the expectations for competence should be clearly stated. It should be clear that this is not a 'consultant's charter' but that this is about raising the standards above the status quo. Competence should not just be required from those who are employees but also those who are specialists or those brought in to undertake specific roles within their safety case process. The AP should be reminded that they must use due diligence to ensure that they only use people competent to undertake the task in hand.

## **3. Major Accident Hazards**

As we have made clear throughout the document, introducing the term 'Major Accident Hazards' (MAH) into the principles is at odds with the current regulatory requirements of the Building Safety Bill. The encouragement to 'get on with things' before legislation is passed may mean that APs may not be looking at things in the way intended.

The Bill is clear what is required and defines a Building Safety Risk without limiting its scope to a particular type of event. The reference to MAH is clearly influenced by the HSE's existing safety case regimes which do focus on MAH but they are backed up by regulations that allow that focus to be made. Failure to remedy this disparity between the Bill and the Principles of the Safety Case regime could mean that what is provided by APs and what is required by legislation will not match. It could also be problematic in terms of enforcement of the legislation/regulations. There could also be a significant impact on the work that will be required by APs to either focus on a narrow aspect of the building safety risk or a much wider one that takes into account, any risks.

We have raised this point previously and it has been noted that the safety case regime is not limited to just 'major incidents' although, as a result, they would include them. This is a significant point which we encourage HSE to resolve as a matter of urgency.

## **4. Spread of fire**

The Bill currently only mentions fire rather than smoke or other products of combustion. We have been concerned that by only limiting the text to the word 'fire' that only this would be considered by the AP. Feedback we have had has confirmed, that from a legal perspective, DLUHC are happy that this is not the case and that smoke would be included within this term. It might be advantageous in the Principles document to make this clear so that the extent of the building safety risk is clarified.

## **5. Consideration of firefighters**

The current definition of building safety risk encompasses everyone who are in and around the building in question. While this should be self-explanatory, we have some concerns that there might be confusion amongst APs that they use the same parameters as they would for 'relevant persons' under the Regulatory Reform (Fire Safety) Order 2005. This may occur where the Responsible Person and AP under each piece of legislation are the same (or the person acting on their behalf). In such a circumstance, there is a risk that firefighters responding to an emergency would not be considered as part of the safety case and safety case report.

It may be advantageous to make it clear by providing examples in the Principles document that they need to take into account all persons in and around their building and that considerations under other legislation do not apply in this context.

## **6. Timescales**

The document covers situations where the AP may need to consider other measures and take interim measures. While we realise it is unlikely that there will be specific timescales set which APs should have actions completed by, the broad statements of 'interim', 'temporary' and 'more guidance' do not assist the AP. They also make it difficult for regulators to understand where the boundaries will lie.

Additional practical guidance will be required but this leads back to the need to establish what is reasonable. Only once this is fully defined, can the Principles be clearly understood.

## **7. Cost and Benefit**

The Principles document makes it clear that safety does not come at any cost and that there should be a balance struck between cost and benefit. While there has always been a degree of what is reasonable under the FSO, the concept of cost/benefit analysis as a methodology for determining safety in a building is a relatively alien concept. While this might be a general principle, it is an area where additional guidance will be vital.

In line with some other comment made, without a clear understanding of what is to be considered reasonable and how the regulator is to determine what is 'safe enough', it will be difficult for APs and those acting on their behalf to know how best to understand cost benefit analysis and implement it in a way that doesn't put people at risk due to the cost of implementing measures to reduce it.

The extent to which cost should be considered when considering measures to prevent or reduce the impact of building safety risks should be made clear. Not only should the gross expenditure be considered but to what extent should the AP consider how that money is accounted for, more specifically, should the evaluation of cost vary depending on the extent to which they are passed on to leaseholders or other residents? While it may be unreasonable to expect such detail in this

document, additional guidance on the matter is needed as it forms a fundamental aspect of risk management.

## **8. Resident Engagement**

The Principles document only makes passing reference to the involvement of residents in the safety case regime. While, for the most part, the development of the safety case and associated report will be undertaken by the AP and those acting on their behalf, the document should make reference to the principle of the resident being at the heart of building safety. There should be a greater emphasis on the involvement of the resident, through the resident engagement strategy as residents may be able to supply information as the building 'users' which cannot be obtained from other sources. We would also highlight that in most multi-occupancy buildings the resident has no control over property protection decisions yet are the ones liable for the costs of insuring the building in occupation.

## **9. Non-Worsening Conditions**

The framework for the Safety Case Report provides a mechanism for the building safety regulator (BSR) to challenge assumptions that have been made about safety issues. We seek reassurance that as part of the Safety Case regime, it will be possible for the BSR to require proportionate improvements to the building (e.g. sprinklers) and will not be hampered by the non-worsening clause 4(3), which does not require improvements to building standards to be retrospectively applied. This would resolve the tension between the principle of non-worsening and the objectives of continuous improvement.

A key example of the need for an improvement on non-worsening conditions is Lakanal House, an incident referred to within the principles document itself. Following the six tragic deaths in Lakanal House in 2009, significant refurbishments to the building were undertaken including a conversion to the top floor, which was intended to be sold off.

Despite these investments and cost off-setting, nobody could compel the owners to install sprinkler systems at a marginal cost to the project, because non-worsening provisions prevented regulators from being able to require this. This was despite of the Lakanal Coroner's recommendations, who also observed that refurbishments carried out in 2006/7 provided numerous opportunities to consider whether the level of fire protection was adequate.

Ensuring continuous improvement in building facilities increases the likelihood of that building supporting the needs of all its residents including the most vulnerable in the event of a fire through enhanced protection, detection and firefighting facilities.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Dan Daly". The signature is written in a cursive style with a large, stylized initial "D".

Dan Daly  
**Head of Protection Unit**  
**National Fire Chiefs Council**

Page	Text Referred to	Comment text
<b>Foreword</b>		
3	Serious incidents rarely have a single cause	Accept that as a single statement but this starts to imply that the new regime is about serious incidents.
3	The principles in this document will support you in taking sensible, risk-based, proportionate steps that ensure the safety of the people in and around your buildings.	Proportionality needs to be defined as it can blend with 'reasonable' too. The concept of 'cost benefit analysis' is not as well defined in current fire guidance as it is in the H&S sector so may need expanding.
3	..material guidance	Is 'material' the right word here? This seems like fractional sentence so have joined it to the next
3	the detailed working knowledge	Of what? Needs changing to more accurately identify who this refers to and there needs to be consideration of whose DUTY it will be. Just being 'best placed' to do this is irrelevant when it comes to compliance.
<b>Introduction</b>		
5	manage or are responsible for a building covered by the proposed new laws	It might be good to introduce the concept of the AP at this point and use this language throughout, where relevant. The AP could be defined in a callout here?
5	However, you may want to start preparing for the proposed new regime now to make sure you have laid the foundations of the systems and procedures you may need to have in place for your building, if and when the new law takes effect.	This seems too lightweight when it has been the mantra for years that people should be changing things without waiting for legislative change. While the specifics may be subject to change, you would think that the principles would be the last thing to be amended since they are so strategic. The language 'should' might be considered instead of 'may want'? The if and when bit at the end seems to put doubt in the mind of the reader that it will ever happen. We have already said that it might be subject to change elsewhere so lets just stick with that.
5	The principles described <b>may</b> also help..	Could this not be stronger? If done right, the principles 'will' help meet existing requirements as they go beyond them?
5	..this document does not talk about the many different configurations of modern residential buildings (for example, those	Just say that the principles apply across this range of premises although the details of each will differ, this will be covered in future publications of guidance. You could remove this text. This can also apply to the following paragraph.

	comprising a combination of commercial, retail and residential use). More complex buildings and ownership arrangements will mean that there are more issues you will need to think about as you build your safety case.	
5	are designed and constructed to be safe and of a good standard, and	How is this quantified? Doesn't compliance with building regs simply represent a minimum standard. Also there is a conflict between a compliant building not being safe. There may also be conflict here with existing buildings that have a completion certificate and yet are found to not have adequate construction.
5	severity of a serious incident	This is not how the Bill language currently defines the risk. Simply put, there must be protection from 'a risk'.
5	uses, for example shops	The term 'non-domestic' might help here?
6	The new laws propose that people who manage or are...	Might be better just to say those who are responsible since that is where the duties lie? As per earlier comment, why not define the concept of the accountable person earlier and then use throughout the document?
6	...all reasonable steps	As per above comment on 'proportionality', using terms like 'all reasonable steps' is not necessarily helpful as it is not a well understood term. This should be defined or other guidance referenced.
6	of a major accident	Remove reference to this - although you want to prevent a major incident, this is not what is required by the bill currently.
6	For the purposes of this guide, the phrases 'major accident' and 'major accident hazard' refer to the hazards, risks and incidents covered by Part 4 of the Building Safety Bill.	These phrases used are signposted to the hazards, risks and incidents covered by Part 4 of the BSB but this is vague reference without specifying exactly how they do that. It would be better to use the terminology that already exists in the BSB and does not need further consideration to understand what is being referenced. This would also assist with the issue raised throughout this document regarding terminology.
<b>Safety case regime</b>		
6	major accident.	This is not the requirement of the Bill. This implies that the safety case regime is only about major incidents when they are never referenced for either Fire spread or Structural failure. Only changes or recommendations by the regulator need to consider this.
7	It should be noted that compliance with standards will not	The words may not be right, but I think something needs to be added to explicitly outline that compliance does not necessarily equate to an adequate case for safety

	always mean that harmful events are adequately mitigated	
<b>What is a 'major accident hazard'</b>		
7	What is a 'major accident hazard'? Before considering the 'major accident hazards' in your building, you should consider what the terms 'hazard' and 'risk' mean.	This is an HSE term and is not used in the legislation that the guidance is supporting. Major incident IS used and represents a better term in the building environment.
7	assess how people will be harmed and how likely it is to happen, and	Will implies a certainty. 'could' may be better?
7	Major accident hazards	This seems to be a general phrase being used to represent a risk rather than a hazard which has been defined in the previous section.
7	A major accident hazard is an occurrence that has the potential to adversely impact the health or safety of many people. For example, multiple injuries or deaths, or serious damage to property.	Why is this particularly being emphasised when it is not the focus of the legislative requirements. The reader will be thinking that they no longer need to focus on the smaller events and individuals.
8	Major accident hazards usually need a series of failures to happen in the existing systems and measures to result in catastrophic outcomes. These will be failures of the measures designed to prevent or reduce the likelihood of harm occurring, or in the measures to limit the consequences, or both. Because of this, the likelihood of a major accident is very low. However, when such a series of	This is all very H&S language. It may be good to give an example in here. (e.g. the failure of a flat fire door self-closing device, in connection with inadequate maintenance of smoke control systems may lead to smoke logging of the means of escape which may prevent people being able to evacuate the building)



	<p>failures occur, they can have very severe impact through lives lost, injuries, the destruction of livelihoods, damage to homes and property, and wider societal and economic impact. Therefore, the measures needed to prevent and limit the consequences of a major accident require a systematic approach to their management and control.</p>	
8	<p>Unlike in other safety case regimes, which may have many different types of major accident scenarios, for high-rise residential buildings it is proposed that these are limited to two broad categories of hazard:</p>	<p>These are defined as Building Safety Risks and should be referred to as such in order to maintain consistency with the legislative requirements, unless this changes.</p> <p>Also they are NOT major accidents as defined here. They represent "a risk to the safety of people in or about a building arising from any of the following occurring as regards the building"</p>
8	<p>The new safety case regime is not intended to address the risk of fire and structural failure where the consequences are minor, or an incident is contained to where it started.</p>	<p>The current requirements do not state this. They specifically state (Section 59) 'a risk'. The extent of the hazard that risk represents is not defined and the use of 'a risk' implies that any risk is relevant to the safety case.</p>
8	<p>Therefore, a high-rise building major accident hazard will be a fire or structural failure that: has the potential to impact the safety of occupants on more than one floor has the potential to cause harm to</p>	<p>This outline is fine but where is the direction for this going to come from?</p>

	occupants across multiple compartments is one type of event that leads to another has an impact on surrounding populations	
9	The safety case is all the information you use to manage the risk of fire spread and the structural safety of your building.	More of a thought but can it also be the actual systems and processes, which admittedly are written down as policy, procedure, evidence etc. but if we just say information, does that create the impression it is just about test records and documentation?
9	If you need to prepare a safety case, you will have to think about the major accident hazards of your building and how the things you do link together to prevent a major accident.	Amended with suggested wording that reflect the requirements of the safety case in draft legislation. “If you need to prepare a safety case, you will have to think about the Building Safety Risks as they apply to your building, what you can do to prevent those risks materialising and how to reduce their severity if they do.”
9	existing legal requirements that apply to buildings and you must continue to comply with them.	It might be useful to give examples of such requirements so the reader is clear.
9	It need not cover risks that will only affect individuals in a single incident, such as trips and falls, unless the condition of floors, handrails and walkways could compromise how people evacuate the building in a major accident.	The presence of 'a risk' need to be considered. It might be applicable not to fully go into every single element of risk identification and mitigation where the case for safety can be clearly made through description of the systems that allow appropriate mitigation. The terms major accident implies the incident has no blame. The term major incident is more applicable here Is it the intention that the emphasis on 'major incidents' will be made a requirement through secondary? Doesn't it need to be in the primary? Where is the compulsion to act in alignment with this emphasis and where are the 'hooks' to show non-compliance where they do not?
9	The report should show that you have a clear understanding of the major hazards associated with your building and how the measures you have in place are effective in managing and controlling the risk of a major accident.	It might be better just to include what the requirements under the legislation are, i.e. 1. an assessment of the building safety risks. 2. description of the steps taken to prevent and, where necessary, mitigate the building safety risks.

9	major fire and structural risks have been identified and are being properly managed and controlled.	The guidance can theoretically just say they need information on the major risk but that is not the current requirement in legislation.
10	...major fire and structural hazards	This is not the current legislative requirement.
11	what checks you do to make sure the measures will work when they are needed	Is it slightly broader by asking for them to say why they think they will work in the first place?
11	(eg, periodic reviews, and before and after major changes, such as when the building is refurbished)	And how those reviews are undertaken.
12	major fire and structural accidents	This is not the legislative requirement. The term building safety risk is sufficient to describe the 'thing' being considered. Accidents implies no blame whereas arson, for example, would be a very real consideration. Alternatively, a failure in management would not be an 'accident'. Have amended to use terminology from the legislation
12	proportionate	Generally any mitigating measures in existing buildings will be very costly. How is this proportionality to be assessed? Is it against the cost of multiple lives being lost? And who will pay for additional measures?
12	put together a process to ensure any modifications to the building consider the impact on fire and structural safety	Accept this although to a degree this will be taken care of by the refurbishment process and ensuing safety case requirements.
13	What are the major accidents involving fire spread and structural safety that could affect your building?	There is no legislative requirement for this - where is this emphasis going to come from since there is currently no compulsion on the AP to focus on this aspect.
13	major accidents hazards	There is no legislative requirement for this - where is this emphasis going to come from since there is no compulsion on the AP to focus on this aspect.
13	This requires thinking about the credible..	A risk being credible is established by assessment of likelihood of the risk in the eyes of the AP. This might go against the idea that a major incident or other event (if you accept that as the focus) might have a very low probability but a high level of consequence. It isn't enough to say that common sense should prevail so we will need some guidance on determining what credible means.

13	a more detailed hazard identification of your building focusing on the major hazards accidents	This term implies that there is no fault and is not currently in use in this sector. Major incident would be more recognised. There is also no current requirement in the legislation to focus on this aspect so how can it be the focus of regulatory activity?
13	major hazard event could start and develop, for example, how an escalating fire may develop and what areas of the building it could affect.	These are considerations that would be required but again, there is a requirement to consider A RISK not just a major incident. The use of the MAH term is too HSE orientated and we have seen early adopters be alienated by it even after some exposure to it.
13	major fire and structural accidents	Recurring theme but incident rather than accident would be better and there is no requirement in the legislation to focus on the 'major' aspect of such incidents.
14	Some measures prevent a fire starting or the building structure being weakened (eg, weather protection), some control the likelihood of a major accident (eg, fire compartmentation that prevents fire spread for a minimum period) while others mitigate the consequences (eg, vents and smoke control systems).	This seems to confuse the two measures being discussed. The first requirement is to prevent the building safety risk which will be the measures to prevent. The second is to reduce the effects should it occur. The current text merges the two. The two categories should be separated to make it clear to the reader what is required.
14	structural protection (against, for example, fire and water)	This would prevent not mitigate.
14	maintenance regimes for the building's gas network, electrical systems, plant and equipment	This would prevent not mitigate.
15	Are there enough measures in place for each of the major accident hazards? What condition are these measures in? Will they work as you expect them to, should an event start to happen?	These are all relevant questions for the AP but should there be some additional text after each one to offer some assistance as to how they might be able to answer them? Asking 'are there enough measures' for example my have some additional text about depth of safety by getting the AP to ask themselves if that control measure failed to work, would other control measures still be able to perform? Also the term building safety risk should be used instead of major accident hazard in this instance since that appears to be what the question is aimed at.

	Are there other reasonable steps that you could take?	
15	relevant standards and is therefore 'safe', and that the measures will be fully effective in all situations for the lifetime of the building.	<p>More a general comment but if we accept that compliance with standards is often the benchmark for safety then when looking at the standards and safety, there may be a 'creep' to judge that those original standards can no longer support a safe building. How would the enforcement of that happen given that it could be interpreted as a retroactive application of newer standards over old ones.</p> <p>Just because older standards are used does not mean a building is automatically unsafe but, conversely, there will be situations where clear improvements in standards have been made to the extent it is difficult to call the older ones suitable.</p>
15	You should test these assumptions, to ensure they remain valid as experience has shown that where these measures are present, they sometimes do not work as expected	There should be something here about seeking the assistance of competent persons for some measures as it is unlikely that an AP would be able to test the assumption that a CP3 smoke ventilation design is adequate to protect the means of escape in the event of a fire.
15	To be confident in preventing a major accident..	The legislation only requires taking reasonable steps to prevent a building safety risk materialising. There is no requirement to focus on a major accident and even if there were, the terminology is not helpful as it implies there is no blame and may lead the AP to not consider other incident types.
15	When deciding if more measures are required you will need to take into account the cost of implementation and ongoing maintenance balanced against the reduction in risk that will be delivered.	This safety vs cost analysis is going to need some additional guidance for the AP to be able to understand the parameters they should consider. Otherwise, there is a risk that they could just say the implementation of measures is just too expensive and use that as a defence for not improving the safety of the building.
15	When deciding if more measures are required you will need to take into account the cost of implementation and ongoing maintenance balanced against the reduction in risk that will be delivered.	Also, in some aspects of law, cost is not an adequate excuse to not improving safety.

15	major accident	There is no requirement to only focus on this aspect. How will this be introduced? This matter should be addressed at the start of the document in saying how this will be introduced as a requirement.
15	Now you should consider what systems to have in place to ensure that the assumptions are valid and that you can be confident that the measures would work as you expect. In other words, what are your ongoing management arrangements?	This points to a methodology by which they can evaluate their measures - is this necessarily the same thing as ensuring safety measures will work? The implementation of such as methodology (lets call it a management system) will allow the questions in this section to be answered. Perhaps it should have its own little section outlining the need to a robust system and an example of what that might look like.
15	.. will form part of your Safety Management System	This section seems to be predicated on a presumption that the reader will understand safety management systems. This seems like a H&S area – would be useful to reference appropriate HSE guidance (HSG 65?) For fire safety would it be worth adding a reference to BS 9997 Fire Risk Management Systems?
15	major accident hazards	There is no requirement for this to be the sole focus of the safety case. Also the term major accident hazard should be substituted for major incident in line with what is common terminology in the sector.
15	identify, monitor, maintain, audit, and review the range of measures on which safe occupation depends.	This points back to addressing the actual system used to determine what you need and how you will evaluate things. Should there be an expanded section on the need to develop this as without it, they won't be able to properly identify, monitor, maintain, audit etc.
15	Organisations that manage major accident hazards well measure key aspects of their SMS and controls through <i>leading indicators</i>	The 'leading indicators' term is highlighted in the text but it not explained, exemplified and does not appear again in the document. Given that it was so important to italicise, some additional explanation or example would be helpful here, or remove the reference.
15	major accident hazards	Management of MAH is not a current requirement of the draft legislation. The terminology is also an HSE term and could be substituted to major incident which is language the sector could understand with little additional explanation.
16	major accident hazards	The focus on MAH in this document is not supported by the requirements as laid down in the draft legislation. It is also confusing insofar as it isn't clear when this term is referring to building safety risks as defined in the draft legislation.
16	Are you doing enough?	How do they answer this question? The only way to by analysis of existing measures and seeing where the gaps are.

		Add some descriptive text after this to explain what is meant.
16	...protect people from a major accident	This is not the requirement of the safety case. It is to take steps to describe the steps taken to protect people from a building safety risk. There is no requirement to focus on 'major accident' and the use of this terminology is not necessarily helpful in the sector.
16	There are many sources of information that will help you work out if you have done enough to protect people and to ensure that the measures you have in place will work when needed	It would be useful to give recommended areas for first steps. There is a lot of guidance out there and not all of it will be good/appropriate.
16	to reasonably do to manage, control and mitigate the risk of spread of fire and structural failure	How is reasonably going to be defined. It is difficult to expect people to undertake safety case work when we don't know what that actually looks like. I accept that in terms of broadly setting out the principles, you can state this, but the principle of reasonableness should have its own section in this document.
16	implement interim or temporary measures until more permanent solutions can be put in place.	There will also be reporting requirements such as passing information onto the FRS under the GTI recommendation requirements that would form part of their management system and they may wish to self-refer to the regulator in extreme cases.
17	You want to make sure whatever steps you take are reasonable..	As above, reasonable really needs to be defined within this context.
17	..and are proportionate	As above, proportionate really needs to be defined within this context.
17	..to the risk of a major accident.	There is no legislative requirement for this. The requirements revolve around the building safety risk and this represents 'a risk' from fire spread or structural failure.
<b>Safety case report – who will see it?</b>		
18	BSR will use it to assess and verify your arrangements for managing, controlling and mitigating major fire and structural risks.	It will also be a requirement to submit the safety case report in order to apply for the Building Assessment Certificate.
18	BSR will use it to assess and verify your arrangements for managing, controlling and mitigating major	Therefore, the safety case report will be instrumental in the award of the BAC.

	fire and structural risks.	
<b>What you can do now to start to prepare</b>		
19	how the building is used and managed as well as the physical construction some analysis of which elements of the building are safety critical some review of which component specifications are safety critical involving residents and others who use and maintain the building who can provide valuable insights into the building	These should be a sub-bullet
19	They may contribute to the management and control of the risks of a major accident hazard...	This is not the focus of the safety case as laid in the draft legislation. The need for this focus should be made clear and it will need to be provided for in regulations in order to make it enforceable by the regulator. The term MAH is an HSE one, and major incident would be a better choice given the target sector.
<b>Other legal requirements</b>		
19	Safety cases in the proposed new regime apply to building safety risks involving fire spread and structural failure .	There is also for any other reasons as determined later on but that is okay to leave that out for now as it doesn't assist the AP.
<b>Further Information</b>		
20	You can read detailed guidance on HSE's approach to the evaluation, management and control of hazards and risks, aimed at safety and other professionals. This includes how dutyholders can demonstrate that risks have been reduced in those situations where, for	Should there be something more specific on the HSE website? At the top of the referred page it states that it isn't something that HSE would expect the average manager to look at. There could be an opportunity for the reader to misinterpret the information on these webpages to represent the HSE approach to BSR regulation. There are immediate links on this page to things like Cost Benefit Analysis which may not be at all helpful in this case.



	example, there is a risk of a major accident.	
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